

CAUSE NO. _____

VAN NGUYEN and	§	IN THE DISTRICT COURT OF
THANH HONG NGUYEN,	§	
<i>Plaintiffs,</i>	§	
	§	HARRIS COUNTY, TEXAS
v.	§	
	§	
THUY PHAM,	§	
<i>Defendant.</i>	§	_____ JUDICIAL DISTRICT

PLAINTIFFS’ ORIGINAL PETITION

COMES NOW, Van Nguyen and Thanh Hong Nguyen, Plaintiffs, and files their Original Petition and would respectfully show the Court as follows:

A. Discovery Level

1. Discovery in this case is intended to be conducted under Level 2 of Rule 190 of the Texas Rules of Civil Procedure.

B. Parties

- 2. Plaintiff Van Nguyen is an individual who resides in Dallas County, Texas.
- 3. Plaintiff Thanhhong Nguyen (a/k/a Nguyen Thanh Hong, Chia Se Di Tru) is an individual who resides in Bay County, Florida.
- 4. Defendant Thuy Pham (a/k/a Thuy Phan) is an individual residing in Harris County. Pham may be served with process at 1502 Pine Colony Lane, Pearland, TX 77581.

C. Jurisdiction and Venue

5. Venue is proper pursuant to §15.017 of the Texas Civ. Prac. & Remedies Code, as Plaintiff Van Nguyen resided in Dallas County, Texas at the time of the accrual of the cause of action.

D. Background Facts

6. Thuy Pham, who refers to himself as “Mr. Big”, through the payments to other YouTubers, has engaged in a smear campaign against Plaintiffs, individually, and through his surrogates.

Specifically:

7. On May 11, 2024, on the Thuy Phan talk show in Lac Phong Ke Chuyen YouTube channel (290,352 views), Defendant stated:

-that Thanhhong Nguyen has been using a fake driver license and Thanhhong Nguyen is a pedophile;

- that Thanhhong Nguyen is a very poor man;

- Thuy Pham praised Lac Phong Tu Tuan Hiep who sent his man to Thanhhong Nguyen 's house to record video that house in Panama City Beach, Bay County FL;

- that Thanhhong Nguyen is a scammer; and

-that Van Nguyen is in the US illegally.

<https://photos.app.goo.gl/xT2oJaWUITZpFSxz7>

8. Thuy Pham said in another video of Lac Phong Tu Tuan Hiep's YouTube channel (link below with 290,291 views):

- that Thanhhong Nguyen had addled mouth because Thanhhong Nguyen 's teeth not good, he did not have money to treat his teeth.

<https://photos.app.goo.gl/gPiH2Hdt5FnPyAyd8>

9. Thuy Pham communicated and announced in another video (289,983 views), that, in referring to Van Nguyen:

-That he has the right to suspect that there was an illegal border crossing through Canada into the USA.

When referring to Thanh Hong Nguyen:

-And even then, is your pedophile accusation still valid?;

-that Thanhhong Nguyen did not renew Vietnam passport to escape from the USA back to Vietnam;

-that Thanhhong cannot escape from the USA because of fearing illegal status in the USA;

-that Thuy Pham and other people would track down the route of Thanhhong Nguyen;

-Thuy Pham 's lawyer would help Thuy Pham do that;

-that many people did report to USCIS about Thanhhong Nguyen's status and Thanhhong Nguyen will be removed from the USA;

-that is why Van Nguyen was present in the USA although she should be in Vietnam in that time; and

-that Van Nguyen must show her immigration document to prove her legal entry into the USA.

<https://photos.app.goo.gl/9CriLcvNo5FMCEYWA>

10. Thuy Pham stated that Van Nguyen had a false marriage, and that Van Nguyen is a scammer. Thuy Pham stated that he had personal documents of Van Nguyen (Lac Phong Youtuber named Tu Tuan Hiep who showed I-94 immigration form of Van Nguyen).

(Youtuber Lac Phong Tu Tuan Hiep said in his video" January 2021 (inaudible), you told me, you said there must be evidence, right? Then this is evidence, okay? And you refuse this evidence, then you're good, you can show a legal document that you've been in the US since January 27, 2021, and that you're legal, right? Van Lo Ton [Van Big Puss...] right? Since January 27, 2021, it's like she was stuck, being stuck, waiting for a flight that was why [she couldn't come] back yet, it's like that, so it's not a legal status, everyone. It's illegal. From January 27th, 2021, until now, it has expired, she has not been able to renew. See? And people told me, I dare not confirm this. This is what people said. But that person also said that they just suspected it. They shared that during the time when she came back, during the time when she came back to Vietnam, she celebrated Tet, she celebrated Tet in Vietnam on January 26, 2020. That, after that, she flew to Canada, she transited to the US from Canada, because she was not allowed... this is not certain, I will say what is certain, that, I will say what is certain. And this is what people said that they suspected that. It is because of her immigration status when she left the US, and in 2019 it was denied. So, when she left and re-entered, they did not allow it. That means it's very difficult. If she could do that, then there must be some sneaking around, I don't know. But normally, usually with her immigration status, people won't let her enter the US. It's possible that she would have entered through Canadian forest roads, because she has a Canadian visa. She will enter Canada, and then she would go to Canada, and from Canada she would go to the US. So, she celebrated Tet in the US, ah [no], celebrated Tet in Vietnam on January 26, January 26, then she would start on the 27th, then she might be in Canada with her child(ren) for 3 days. Three or four days, then she would enter the US on the 30th. Here we see that this information is like this on the channel of Chia Se Di Tru, then we can compare to see if the words of that audience are true or not. That audience said that people suspect that she sneaked in from Canada. That means she applied for a refugee status or something, I don't know what it was, I must find out more, it was from Canada to the US, like she used to tell some of her friends. That's why it appeared in the form DA, not in an official way, everyone. The form showed Class of Admission DA meaning it is not official, but it's like in an emergency case of asylum or something. So, maybe she used that trick to go from Canada to the US."

11. Mastermind Hong the Pedophile

In many videos, in referring to Thanh Hong Nguyen, Pham talked to Lac Phong Tu Tuan Hiep and Truc Linh and other Youtubers and praised them to falsely state:

“Hong the Pedophile, that is Nguyen Thanh Hong, his parents are in Da Nang. We were informed that his mother is in the hospital, but he did not return from the USA. And maybe if his mother pass away..., I do not curse anything, but she is very old, I also wish for her to live long and healthy, but with an old person you never know, 80 to 90 years old. If by chance, if by chance, just by chance, though I do not want that to happen, but if his mother passes away, he will not be able to return to Vietnam, you know. The way he left [the country], is like leaving for good. How many years has it been since its father died? It’s been more than ten years, 15, 16 years he hasn’t returned. And his children, he left Vietnam when its children were still babies. Right? It wasn’t until they grew up that their step uncle brought them to America. But when they got to America, he claimed that was all his credit, you know. Today I’ll tell you the story of Hong the Pedophile... first. Then it’ll follow by a long story, fellows. Be patient with me, ok? So, Hong the Pedophile...”

<https://photos.app.goo.gl/kR5ewzWJc9Qweiou6>

<https://photos.app.goo.gl/UZBTdHGU9Rh27CNW7>

<https://photos.app.goo.gl/Vk21vPc1ibf2DNkG8>

12. Thuy Pham also affirmed:

-that “Hong the Pedophile is deceiving the online community and Hong wants to attack my company;

-Hong threatens to attack my company, threatens my property, and even the lives of my family;

-Why did he come to my house to terrorize me?”;

-Because I mention that these people might come to the company, might cause a fire, might burn down the company, might do all sorts of things; and

-Thuy Pham said to audiences that he bought guns to protect his family.

https://youtu.be/tD5_7BMVUDM?si=t9PJFUnba7kyK73i (“Lac Phong khai het”)

13. Thuy Pham threatened to incite his 300 workers to report to USCIS and falsely claim that Thanhhong Nguyen’s status in the USA is illegal. Thuy Pham stated his 300 workers would not let a smuggled man bully their boss. He also said that his workers hate smuggled people.

https://youtube.com/watch?v=tD5_7BMVUDM&si=grJSFglxz57dDe1D

14. Thuy Pham repeatedly refers to Van Nguyen as:

-She was having an affair with Mr. Chia Se Di Tru (Thanh Hong Nguyen), and the 2 of them traveled across the states, hanging out together, traveling together everywhere. So, the USCIS suspected that Van Nguyen was taking advantage of Mr. Nelson, a fraudulent marriage;

-And this Van Nguyen, along with her lover, Mr. Nguyen Thanh Hong, came to Mr. Nelson's house to terrorize and threaten Mr. Nelson. And Nguyen Thanh Hong pretended to be Van Nguyen's lawyer, to come and terrorize Mr. Nelson;

-There is this decision [paperwork]. Here, the decision to deny the green card for Ms. Van Nguyen; and

-They have denied the green card for Ms. Van Nguyen. And these are the reasons why they denied the green card.

https://youtube.com/watch?v=tD5_7BMVUDM&si=grJSFglxzS7dDeID

15. In many videos, although Plaintiff Thanh Hong Nguyen denies any wrongdoing, and correctly states that a jury found him not guilty in a trial in Boston, Thuy Pham and Lac Phong Tu Tuan Hiep falsely stated that:

-And you Hong, your behavior is pedophilia, do you understand? It is the behavior that constitutes human morality, while a few curses are just a normal thing, do you understand? Do you remember? Stop being pedophilia!;

-You are a pedophile....;

-The court ruled that you are not guilty, but the U.S. prosecutor accused you of being a pedophile;

-You are so stupid (Multiple times);

-They don't have enough evidence to convict you, but you are not innocent. [They] did not prove that you did not do that. And I believe that you did do that, do you understand? And if you sue, you have to sue the U.S. prosecutor. You are stupid!;

-Well, the court said you are not guilty, but you did put your hand in the girl's body;

-The court declared you Not Guilty, but the problem is that you were a pedophile;

-Now the lawyer of Hong the Pedophile....;

-Hong the Pedophile; and

-You're a pedophile.

16. On May 15th 2024, Thuy Pham talked show in Van Thi Truc Linh YouTube channel that:

- Thanhhong Nguyen is a smuggled man in the USA;
- Thanhhong Nguyen who is a Tax dodger;
- Thuy Pham 's lawyer would push Thanhhong Nguyen out of the USA and Thanhhong Nguyen never could harm Thuy Pham's company;
- If Van Nguyen and Thanhhong Nguyen returned to Vietnam, they could never can come back to the USA because of lack of legal immigration documents;
- Thanhhong Nguyen has a fraudulent marriage with Sarah Nguyen;
- Van Nguyen also has a false marriage; and
- Van Nguyen used a false address.

<https://photos.app.goo.gl/Eci6bDnQ4WxcFKfK7>
<https://photos.app.goo.gl/yFbApPaeKTBVqRd98>
<https://photos.app.goo.gl/L6FYTuDgdideCnne7>
<https://photos.app.goo.gl/Cpy9v7kY6vQnfWEKA>
<https://photos.app.goo.gl/h8u2taexHyjwZxtYA>

17. Thuy Pham has provided financial support and false information to the following Youtubers, to further smear Plaintiffs in the same manner:

Lac Phong Tu Tuan Hiep, owner of channel named Lac Phong Ke Chuyen
 Van Thi Truc Linh, channel Truc Linh Ngay Moi and Drama Drama
 Nguyen Thu Trang, channel 4T Vlog and Ut Buon 4T
 Kim Anh Tran, channel Kim Anh CP
 Hoang Xuan Truong, channel Giai Tri Tong Hop
 Dinh Thi Huong Ca, channel Huong Ka
 Huynh Thanh Phuong, channel Ga Xanh Lun
 Pham Ngoc Thao, channel Thao TV 85
 Tieng Choi Tre, Thai Viet Hung, Thuy Nguyen 7...

For example:

<https://youtu.be/MUktGJ8zH4?si=153J7kAh6oEtCrYW>
 (https://youtu.be/-3sbVjaYaYI?si=XwhtAMFnBovEJc66)
<https://youtu.be/qZJicQ3nlsQ?si=9LAPyJ3BrkHp4Vvd>
<https://youtu.be/ZXfUJ0fD29g?si=aXyOSheqEoqp3N0w>
<https://youtu.be/-CBT9teDt4s?si=uJGUfby4nTDLkLHg>
https://youtu.be/jEEPP3XPl-w?si=WTV6a3pus_NiW_Sc

https://youtu.be/WO5mvHF7NOk?si=Vxuww_MrceayPi01m
https://youtu.be/wCXUA_a-Llg?si=Zw0cEispqg7KuKHV

E. Defamation Per Se

18. Plaintiffs hereby incorporate all prior allegations by reference.
19. All of the alleged defamatory statements are false.
20. The statements were defamatory per se because they unambiguously charge Plaintiffs with a crime, dishonesty, fraud, rascality, unchastity of a woman, and general depravity.
21. These statements have damaged Plaintiffs as the false statements have caused severe damage to their reputation in their communities and caused severe mental anguish to Plaintiffs.
22. A retraction letter was sent on February 22, 2015, and an updated retraction letter was sent on March 24, 2025. As of the date of this filing, there has been no response.

F. Common Law Defamation

23. Plaintiff hereby incorporates all prior allegations by reference.
24. These statements involved a private matter as Plaintiffs are not public figures and are not involved in any public controversy in connection with their personal life, profession, trade, or business.
25. These statements referred to Plaintiffs by name or implication.
26. These statements were false.
27. Defendant acted with actual malice or was at least negligent when he made these statements.
28. Defendant acted with reckless disregard for the truth or falsity of the statements made.
29. The statements were defamatory because they unambiguously or through implication conveyed the idea or was reasonably understood by readers that Plaintiff Thanh Hong Nguyen is a pedophile and a crook.

30. These statements are false.

31. The statements were defamatory because they unambiguously or through implication conveyed the idea or was reasonably understood by readers that Plaintiff Van Nguyen is an adulteress and a crook.

32. These statements are false.

33. These statements have damaged Plaintiffs, causing severe damages to their reputation in the community, social relationships, and safety. Further, these statements have cause both Plaintiffs severe emotional distress.

G. Exemplary Damages

34. Pham made these false allegations with actual malice.

35. Pham acted with reckless disregard for the truth or falsity of the statements made.

36. Plaintiffs seek the imposition of exemplary damages.

H. Racketeer Influenced and Corrupt Organizations Act ("RICO") 18 U.S.C. § 1961 ET SEQ.

37. Plaintiffs hereby incorporate all prior allegations by reference.

38. State Courts have concurrent jurisdiction to decide civil claims brought under RICO. *Tafflin v. Levitt*, 493 U.S. 455 (1990).

39. To recover under § 1962(c), a plaintiff must prove (1) that an enterprise existed; (2) that the enterprise engaged in, or had some effect upon, interstate or foreign commerce; (3) that the defendant was employed by or associated with the alleged enterprise; (4) that the defendant knowingly and willfully conducted or participated, directly or indirectly, in the conduct of the affairs of the alleged enterprise, and (5) that the defendant did so knowingly and willfully through a pattern of racketeering activity. *5th Circuit Pattern Jury Charge*.

40. Defendant Pham's smear campaign, both individually and through his subordinates, satisfies the definition of "enterprise" and establishes Defendant Pham's association with and participation in the enterprise.

41. The payments Defendant Pham made, and the perceived boost to his and his subordinates' YouTube channels had an effect on both interstate and foreign commerce.

42. Cyber harassment/cyber bullying is a predicate act within RICO.

43. Plaintiffs seek treble damages and costs of suit, including attorney's fees as provided in 18 U.S.C. § 1964(c).

I. Jury Demand

Plaintiffs hereby demand a trial by jury and tenders the jury fee with this pleading.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that upon final hearing, the Court award Plaintiffs actual and exemplary damages, treble damages, attorney's fees, and award Plaintiffs all other relief to which they are justly entitled, at law or at equity.

Respectfully submitted,

LAW OFFICE OF BRIAN TURNER
308 N. Washington Ave.
Bryan, TX 77803
(979) 583-9200 – Telephone
(979) 314-9533 – Telecopier
bt@brianturnerlaw.com

By: /s/ Brian Turner

Brian Turner

State Bar No. 20310450